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11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
14

15 FEDERAL NATIONAL MORTGAGE
16 ASSOCIATION,

17 Plaintiff,

18 v.

19 JAYEM FAMILY, LP,

20 Defendant.

Case No. 2:17-cv-01582-MMD-KJK

**STIPULATION AND ORDER TO
EXTEND RESPONSIVE PLEADING
DEADLINE**

(Second Request)

21 Plaintiff FEDERAL NATIONAL MORTGAGE ASSOCIATION ("Fannie Mae"), and
22 Defendant JAYEM FAMILY, LP ("Jayem") (collectively referred to herein as the "Parties"), by and
23 through their respective counsel of record, hereby stipulate and agree to extend the responsive
24 pleading deadline to the Complaint on file herein (ECF No. 1). This is the Parties' second request.

25 1. Jayem has retained counsel in this matter, who on September 14, 2017, accepted
26 service of a copy of the summons and complaint on file herein.

27 2. Fannie Mae and Jayem are currently in settlement discussions in an effort to resolve
28 the title dispute to the property at issue in this case, as well as several other properties where Jayem
(or its affiliates) and Fannie Mae or Freddie Mac are claiming adverse interests.

3. One of the goals of the settlement discussions is to save litigation costs in this action
as well as other lawsuits where Jayem and Fannie Mae or Freddie Mac are parties.

4. The Parties obtained a prior extension in order to conduct settlement negotiations and, unfortunately, discussions have taken longer than previously anticipated. However, the Parties still believe that settlement is a possibility and simply need more time to adequately negotiate without increasing the Parties' respective litigation costs.

5. Given that the settlement discussions involve multiple or more than one property and lawsuit, and that time will be needed to gather and collect data for each property, the Parties anticipate it will take an additional 45 days to determine if a settlement can be accomplished.

6. Accordingly, the Parties agreed that good cause exists to extend Jayem's responsive pleading deadline to January 26, 2018 and the Parties hereby respectfully request that the Court enter an order confirming said deadline.

IT IS SO STIPULATED AND AGREED.

Dated: December 11, 2017

TAKOS LAW GROUP, LTD.

ALDRIDGE PITE, LLP

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IT IS SO ORDERED.

Dated this 12 day of December, 2017.

UNITED STATES MAGISTRATE JUDGE